

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

SEP -7 2016

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

YOHANSAN J. STEWART,

Defendant.

4:16CR402 RLW/JMB

INDICTMENT

COUNT I

The Grand Jury charges that:

1. Walmart is a retailer with stores located throughout the United States, including a number of stores within the Eastern District of Missouri.
2. Beginning on or about February 7, 2014 and continuing through on or about August 24, 2014 in the Eastern District of Missouri and elsewhere

YOHANSAN STEWART,

the Defendant herein, knowingly or willfully conspired, combined, confederated, and agreed together and with other persons both known and unknown to the Grand Jury, to knowingly and with intent to defraud unlawfully transport, transmit, and transfer in interstate commerce stolen goods, wares and merchandise, that is, products from Walmart stores, of the value of \$5,000 or more, knowing the same to have been stolen, converted, and taken by fraud.

In violation of Title 18, United States Code, Section 2314.

MANNER AND MEANS OF THE CONSPIRACY

The Defendant and co-conspirators accomplished and attempted to accomplish the objects of the conspiracy in the following manner and through the following means:

3. It was part of the conspiracy that the **Defendant Yohansan Stewart**, with others known and unknown to the Grand Jury visited Walmart locations in a number of states, including stores located within the Eastern District of Missouri.

4. It was further part of said conspiracy that **Defendant Yohansan Stewart** would enter the Walmart store and break into the display cases which held various electronics. **Defendant Yohansan Stewart** would conceal these items and exit the store without paying for them.

5. It was further part of said conspiracy that **Defendant Yohansan Stewart** and her associates would transport the stolen merchandise to Florida and other places.

6. It was further part of said conspiracy that, in some instances, **Defendant Yohansan Stewart** sold the stolen merchandise; in other instances, the merchandise was provided to associates to be sold. In still other instances, **Defendant Yohansan Stewart** provided the stolen merchandise to associates who would return the items to a different Walmart store in exchange for gift cards to be used at a later date to purchase other items.

7. It was further part of said conspiracy that **Defendant Yohansan Stewart** would rent vehicles for use during the commission of the thefts.

8. The value of the merchandise stolen during the course of the conspiracy was more than \$5,000.

OVERT ACTS

9. In furtherance of and to effect the object of the conspiracy, one or more of the co-conspirators committed and caused to be committed one or more of the following overt acts in

the Eastern District of Missouri;

a. On or about August 22, 2014, **Defendant Yohansan Stewart** stole 24 iPad electronic devices from the Walmart located at 2700 Ridge Point Drive, High Ridge, Missouri valued at \$8,229.

b. On or about August 22, 2014, **Defendant Yohansan Stewart** stole 29 iPad electronic devices from the Walmart located at 12862 State Route 21, De Soto, Missouri valued at \$10,731.

c. On or about August 22, 2014, **Defendant Yohansan Stewart** stole 39 cellular phones and tablets from the Walmart located at #1 Memorial Drive, Potosi, Missouri valued at \$20,139.98.

d. On or about August 23, 2014, **Defendant Yohansan Stewart** stole five Xbox One gaming consoles and 53 cellular phones from the Walmart located at 2206 North Baltimore Street, Kirksville, Missouri in the amount of \$33,186.98.

All in violation of Title 18, United States Code, Sections 371.

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Sections 981(a) and Title 28, United States Code, Section 2461(c), upon conviction of an offense in violation of Title 18, United States Code, Section 2314 as set forth in Count One, the defendant shall forfeit to the United States of America any property, real or personal, constituting or derived from any proceeds traceable to said offense.

2. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds traceable to said offense.

A TRUE BILL.

FOREPERSON

RICHARD G. CALLAHAN
United States Attorney

Stephen Casey #58879MO
Assistant United States Attorney